

STATE OF ILLINOIS
ILLINOIS COMMERCE COMMISSION

Illinois Commerce Commission
On Its Own Motion

01-0662

Investigation concerning
Illinois Bell Telephone Company's
compliance with Section 271 of
the Telecommunications Act of
1996.

OFFICIAL FILE

I.C.C. DOCKET NO. 01-0662

Worldcom Exhibit No. 2.0

Witness Hurter

Date 7/1/02 Reporter Kal

PUBLIC VERSION

DIRECT TESTIMONY OF A. EARL HURTER

ON BEHALF OF

WORLDCOM, INC.

WORLDCOM EX. 2.0

March 20, 2002

I. INTRODUCTION

**Q. PLEASE STATE YOUR NAME, BY WHOM YOU ARE EMPLOYED,
YOUR BUSINESS ADDRESS AND YOUR POSITION.**

A. My name is A. Earl Hurter. I am the Senior Manager for Central Line Cost Management within WorldCom, including the subsidiary companies of MCImetro Access Transmission Services, Inc., and MCI WorldCom Communications, Inc., referred to in my testimony as "MCI" or "WorldCom".

Q. BRIEFLY STATE YOUR EDUCATIONAL BACKGROUND.

A. I received my Master of Science degree in Telecommunications and Computer Science from DePaul University, Chicago, in 1993 and graduated Suma Cum Laude. I received by Bachelor of Science degree from Northeastern Illinois University, Chicago, in 1983 and graduated Magna Cum Laude. I also studied Electrical Engineering and Computer Science at Northwestern University, Evanston, IL, from 1978 - 1981

**Q. PLEASE STATE YOUR PREVIOUS WORK EXPERIENCE IN THE
AREA OF TELECOMMUNICATIONS.**

A. I have been employed by WorldCom or its predecessor entities for sixteen years. My experience includes five years in engineering and provisioning, five years in terminal and field operations, and six years in line cost management. My present

24 title is Senior Manager for Central Region Line Cost Management, where I manage
25 the auditing and payment of telephone company ("telco") invoices from many
26 companies, including Ameritech. I have held this position for three years.

27
28 **II. PURPOSE**

29 **Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY?**
30

31 **A.** I will discuss certain billing issues with Ameritech relating to situations where
32 WorldCom provides local service via UNE-P. These issues include the topics of
33 local toll billing, Operator Services/Directory Assistance (OS/DA) billing, and
34 Ameritech billing WorldCom for customers who either no longer are, or never have
35 been, WorldCom customers.

36 **III. DISCUSSION**

37 **Q. WHAT IS PRESENTLY IMPROPER ABOUT THE WAY IN WHICH**
38 **AMERITECH BILLS FOR LOCAL TOLL USAGE?**

39 **A.** At a high level, there are four main issues with respect to Ameritech's billing of
40 WorldCom for local toll usage. First, Ameritech should not be billing WorldCom
41 for local toll usage. Second, even if there were circumstances in which it would be
42 appropriate for Ameritech to bill WorldCom for local toll usage, the billing
43 format is improper. Local toll usage should be in the CABS format, as opposed to
44 the CRIS billing which Ameritech is presently utilizing for local toll usage. Third,
45 the rate that Ameritech is charging WorldCom for local toll usage -- 42.3 cents

per minute -- is entirely improper. And finally, the way in which Ameritech lists the jurisdiction of the calls on its CABS billings is entirely improper.

Q. YOU MENTIONED ABOVE THAT AMERITECH SHOULD NOT BE BILLING WORLDCOM FOR LOCAL TOLL USAGE. PLEASE EXPLAIN HOW AMERITECH IS BILLING WORLDCOM FOR THIS USAGE AND WHY IT IS IMPROPER FOR AMERITECH TO BILL WORLDCOM FOR LOCAL TOLL USAGE.

A. From January 2001 until the February 16, 2002 invoice (which is the most recently reviewable invoice as of the time of the filing of this testimony) Ameritech has improperly billed WorldCom in excess of **(CLEC-Specific Confidential Information: \$*****)** for local toll usage. This amount has appeared on UNE-P bills received from Ameritech for both Illinois and Michigan.

Where WorldCom provides local service via UNE-P, a large volume of local toll calls are being routed over the Ameritech network and Ameritech is billing WorldCom for these calls at a very high per-minute rate regardless of who the presubscribed carrier for the customer is for these calls. It is believed that in most cases, the local toll PIC is WorldCom, but we have been billed for local toll usage when another interexchange carrier (IXC) or Ameritech is the local toll PIC. WorldCom has also been billed for local toll usage for customers who have not selected a carrier for local toll calls.

68 These local toll charges appear on the monthly CRIS bill which Ameritech sends
69 to WorldCom. Attached as Schedule EH-1 is such a billing dated February 16,
70 2002, for Illinois. There are two versions of Schedule EH-1. One version is the
71 actual bill which contains CLEC-Specific Confidential Information, and the other
72 version is a public version with this confidential information redacted. This
73 Schedule EH-1 is the entirety of the paper monthly CRIS bill. It is 8 pages in total
74 and the billed amount is slightly over **(CLEC-Specific Confidential**
75 **Information: \$*****)** for unbundled charges, including "Recurring
76 Charges", "Usage-Intraswitch", "Non-Recurring Charges", "Miscellaneous" and
77 "Daily Usage Record Charges".

78
79 The "Miscellaneous" part of the bill has a charge type defined as local toll. This
80 is identified with a USOC/Charge Type of 919211 as set forth on the bill.
81 (Schedule EH-1, pages 4 and 6). (A USOC (universal service order code) allows
82 for the separate identification of the various billing elements and their respective
83 rates. Customers who are presubscribed to WorldCom for local toll should have
84 their local toll calls routed directly to the WorldCom long distance switch and
85 Ameritech should not be billing WorldCom usage for these calls. Yet, Ameritech
86 is billing WorldCom usage for local toll calls as evidenced by Schedule EH-1.

87
88 **Q. HOW DID YOU FIRST DISCOVER THAT AMERITECH WAS BILLING**
89 **WORLDCOM FOR LOCAL TOLL USAGE?**

90 A. We discovered these usage charges after conducting an investigation of the DUF
91 records we received from Ameritech. The DUF records showed that we were
92 receiving so-called Category 10 records. A Category 10 record indicates a local
93 toll call. We then conducted an investigation of the monthly bills, resulting in the
94 discovery of the "Misc." category on the CRIS bill. Included in the "Misc."
95 category was the USOC for local toll calls.

96 Q. **SHOULD AMERITECH BILL WORLDCOM FOR ANY LOCAL TOLL**
97 **USAGE?**

98 A. No. For those customers who have WorldCom for local and Ameritech (or
99 another IXC) for local toll, the customer should be billed by Ameritech (or the
100 other IXC) for the local toll calls. Ameritech should not be billing WorldCom for
101 these calls. Yet, Ameritech is billing WorldCom for these calls in the monthly
102 bills such as Schedule EH-1. As explained earlier, we discovered local toll records
103 in the DUF. Comparing the calling party ANI to the presubscribed database
104 revealed that many of the customer's making local toll calls that appeared on the
105 DUF were not WorldCom local toll customers.

106 Q. **SHOULD WORLDCOM BE BILLED FOR LOCAL TOLL USAGE IF THE**
107 **CUSTOMER HAS NOT DESIGNATED A LOCAL TOLL CARRIER?**

108 A. No. Ameritech should not be billing WorldCom for local toll usage for those
109 customers who have not designated a presubscribed carrier for local toll.
110 Ameritech should be blocking these calls instead of processing these calls and
111 billing WorldCom for these calls. Yet, Ameritech is billing WorldCom for these

112 calls in monthly bills such as Schedule EH-1. The same process as explained
113 above was used to determine if the originating party was presubscribed to WCOM
114 or had a 'no' PIC for local toll calling.

115 **Q. PREVIOUSLY, YOU MENTIONED THAT EVEN IF AMERITECH**
116 **COULD PROPERLY BILL WORLDCOM FOR LOCAL TOLL USAGE,**
117 **THAT THE BILLING SHOULD BE IN CABS FORMAT, AS OPPOSED**
118 **TO THE CRIS FORMAT WHICH AMERITECH IS PRESENTLY**
119 **SENDING TO WORLDCOM FOR LOCAL TOLL USAGE. PLEASE**
120 **EXPLAIN.**

121 **A.** Ameritech has been sending the local toll usage billing to WorldCom in CRIS
122 format, such as set forth in Schedule EH-1. However, Ameritech previously
123 committed to sending all telco billing to WorldCom in CABS format, except for
124 Operator Services and Directory Assistance. Ameritech had committed to
125 implement this type of CABS billing no later than the fourth quarter of 2001, yet
126 it has not done so. (For an example of Ameritech's commitment to implement
127 CABS billing, see Ameritech Accessible Letter CLECAM01-236, dated August
128 14, 2001, which is attached as Schedule EH-2).

129

130 **Q. YOU PREVIOUSLY MENTIONED THAT AMERITECH IS CHARGING**
131 **WORLDCOM A RATE OF 42.3 CENTS PER MINUTE FOR LOCAL**
132 **TOLL USAGE IN ILLINOIS AND THAT THIS IS IMPROPER. PLEASE**
133 **EXPLAIN.**

134

135 A. As set forth above, there should be no charge for these local toll calls. Yet,
136 Ameritech is billing WorldCom about 42.3 cents per minute in Illinois. (See, the
137 sixth page of Schedule EH-1 which shows **CLEC-Specific Confidential**
138 **Information: \$***** in charges for *****minutes. \$***** divided**
139 **by ***** minutes is 42.3 cents per minute**). This issue has been on-
140 going with a total claim (from 1/1/01 through the bill dated February 16, 2002) of
141 more than over (**CLEC-Specific Confidential Information: \$*******) and
142 is increasing monthly.

143

144 Q. **YOU PREVIOUSLY MENTIONED THAT THE WAY IN WHICH**
145 **AMERITECH LISTS THE JURISDICTION FOR THE CALLS ON ITS**
146 **CABS BILLING IS ENTIRELY IMPROPER. PLEASE EXPLAIN.**

147 A. The CABS billing is supposed to categorize the jurisdiction of the calls being
148 billed. By "jurisdiction", this means whether the calls being billed are local, local
149 toll, etc. While I explained above that WorldCom should not be billed for any of
150 the local toll calls, the CABS bill which Ameritech is sending to WorldCom has
151 put **all** of the calls and usage as being local toll (or, in the wording of CABS,
152 "intrastate/intraLATA" calls.) A more specific description is that all CABS usage
153 being billed by Ameritech shows that all usage is for jurisdiction "3" which is
154 supposed to designate intrastate/intraLATA usage, while the Ameritech CABS
155 bill shows zero usage for jurisdiction "5" which is supposed to designate local

156 usage. If the bills were properly issued, there would be no local toll billing in the
157 CABS bills, and all local calls would be in the jurisdiction "5" category.

158

159 **Q. YOU STATE THAT THE ISSUE HAS BEEN ON-GOING. HOW HAVE**
160 **YOU BROUGHT THIS ISSUE TO THE ATTENTION OF AMERITECH?**

161 **A.** I have had several conference calls with Ameritech on these issues. The most
162 recent meetings took place on November 30, 2001, and December 18, 2001. In
163 addition to the conference calls, there have been follow-up requests via email and
164 phone conversations as to the status of the on-going dispute. The most recent
165 status from the Ameritech account team is that their research is on-going.

166

167 In these meetings, Ameritech has agreed that customers who are presubscribed to
168 WorldCom for local toll or who are not presubscribed to any carrier for local toll
169 should not have their local toll calls billed to WorldCom. Ameritech contends that
170 the category of customers who are not presubscribed to any local toll carrier
171 should represent a small percentage of the total charges appearing in this category
172 of billing.

173

174 Ameritech continues to research this issue but has denied these claims and insists
175 on collecting on its bills for these items.

176

177 Ameritech has also raised a procedural issue, asserting that before it will even
178 consider a dispute on billings of this nature, WorldCom must first present call
179 detail to Ameritech. Call detail in this situation would be the date and time of each
180 call at issue together with the originating and terminating numbers. There is no
181 reason why call detail information would have to be supplied by WorldCom.
182 Ameritech issued the bill and Ameritech should have the call detail to support its
183 bills. Further, considering that the entire *category* of charges is unfounded,
184 providing the call detail would be of little value and frankly makes no sense.

185

186 **Q. ARE THERE OTHER SIGNIFICANT PROBLEMS WITH THE**
187 **MONTHLY CRIS BILL ISSUED BY AMERITECH?**

188 **A.** Yes. There is a significant problem with the billing for OS/DA. For
189 OS/DA calls the bill averages \$0.429 per call. (See, for example, the seventh page
190 of Schedule EH-1 for USOC 919305 a charge of **(CLEC-Specific Confidential**
191 **Information: \$***** for ***** calls. \$***** divided by *******
192 **calls** amounts to \$0.429 per call.)

193

194 It is apparent that the Ameritech charges for Directory Assistance and Operator
195 Services grossly exceed the *tariffed rates in Illinois*. The rate for unbundled
196 Directory Assistance calls in Ameritech's Illinois Tariff is \$.258 per call (see,
197 Illinois Bell Tariff, ILL. C. C. No. 20, part 19, Section 7, 1st revised Sheet No. 9,
198 attached as Schedule EH-3). The Ameritech Illinois tariffed rate for unbundled

199 Operator Services calls for manual call assistance is \$.364 per call. (See, Illinois
200 Bell Tariff, ILL. C. C. No. 20, part 19, Section 8, 2nd revised Sheet No. 10,
201 attached as Schedule EH-4).

202

203 **Q. DOES THIS COMPLETE YOUR DIRECT TESTIMONY IN THIS**
204 **MATTER?**

205 **A.** Yes.

WorldCom Ex 2.0
Hurter Direct
Investigation Regarding Illinois Bell Section 271 Compliance
Docket No. 01-0662
Schedule EH-1
Public Version

This schedule contains the following:

Examples of invoices from Ameritech Unbundled Services.

This schedule contains a total of nine (9) pages.

Remittance
from
AMERITECH UNBUNDLED SERVICES



Date: 2/16/02

Customer Code:

Customer #:

Terms:

Invoice #: 109695 ~-

To: WorldCom

205 N. Michigan Ave., Suite 3700

Dept 9467/500

Chicago, IL 60601

Attn: James Devries

Previous Balance:

Payments:

Adjustments:

Late Payment Charge

Current Invoice:

Due By: 3/18/02

Balance Due:

Please remit payment to

Ameritech - RBS
P.O. Box 1838
Saginaw, MI 48605-1838

For Billing Questions call: (616) 257-1888

WorldCom Ex. 2.0
Hurter Direct
Investigation regarding Illinois Bell Section 271 compliance
Docket No. 01-0662
Schedule EH-1
PUBLIC VERSION

SUMMARY INVOICE
from
AMERITECH UNBUNDLED SERVICES



To: WorldCom
205 N. Michigan Ave., Suite 3700
Dept 9467/500
Chicago, IL 60601
Attn: James Devries

Invoice Number: 109695

Customer Code:

Customer #:

Invoice Date: 2/16/02

Due Date: 3/18/02

Page 1

CURRENT CHARGES

Unbundling

Recurring Charges

Usage - Intraswitch

Non-Recurring Charges

Miscellaneous

Unbundling TOTAL:

Daily Usage Record Charges

Daily Usage Record Charges

Daily Usage Record Charges TOTAL:

GRAND TOTAL:

WorldCom Ex. 2.0
Hurter Direct
Investigation regarding Illinois Bell Section 271 compliance
Docket No. 01-0662
Schedule EH-1
PUBLIC VERSION

2

DETAIL INVOICE
from
AMERITECH UNBUNDLED SERVICES



Invoice Number: 109695

Customer Code:

Customer #:

Invoice Date: 2/16/02

Bill Group: Unbundling

Bill Line: Recurring Charges

Class of Service	USOC/Charge Type	Qty	Current Charges
PU7	CXC9X		
PU7	NSR		
PU7	UJR		

Bill Line Total :

Bill Line: Usage - Intraswitch

Class of Service	USOC/Charge Type	Qty	Current Charges
RES	919305		
BUS	919305		

Bill Line Total :

Bill Line: Non-Recurring Charges

Class of Service	USOC/Charge Type	Qty	Current Charges
PU7	NR9UU		

WorldCom Ex. 2.0
Hurter Direct
Investigation regarding Illinois Bell Section 271 compliance
Page 1
Docket No. 01-0662
Schedule EH-1
PUBLIC VERSION

3

Bill Line Total :

Bill Line: Miscellaneous

Class of Service	USOC/Charge Type	Qty	Current Charges
BUS	919205		
RES	919205		
BUS	919206		
RES	919206		
BUS	919211		
RES	919211		
RES	919233		
RES	919305		
RES	919365		
RES	919377		
RES	999380		
RES	999381		
RES	999383		
RES	999384		
RES	999385		
RES	999388		
PU7	ESX		
PU7	N8D		
PU7	NPU		
PU7	NRSC		
PU7	UXTBU		

Bill Line Total :

WorldCom Ex. 2.0
Hurter Direct
Investigation regarding Illinois Bell Section 271 compliance
Docket No. 01-0662
Schedule EH-1
PUBLIC VERSION

Bill Group Total :

\$860,417.12

Bill Group: Daily Usage Record Charges

Bill Line: Daily Usage Record Charges

Class of Service	USOC/Charge Type	Qty	Current Charges
------------------	------------------	-----	-----------------

DURC	@DURC		
------	-------	--	--

Bill Line Total :

Bill Group Total :

Invoice	109695	Total
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End of Invoice 109695

WorldCom Ex. 2.0
Hurter Direct
Investigation regarding Illinois Bell Section 271 compliance
Docket No. 01-0662
Schedule EH-1
PUBLIC VERSION

AUDIT DETAIL INVOICE

from

AMERITECH UNBUNDLED SERVICES



Invoice Number: 109695

Customer #: 040L027229000

Customer Code: WUAIL

Invoice Date: 2/16/02

Summary Invoice Group: Unbundling

Summary Invoice Line: Recurring Charges

Class of Service	USOC / Call Pack	Qty / Msgs	Current Charges	Usage Minutes	Recurring Charge	Recurring Qty	Fractional Charge	Fractional Qty	OC/C Charge	OC/C Qty
PU7	CXC9X				\$0.00	0			\$0.00	0
PU7	NSR				\$0.00	0			\$0.00	0
PU7	UJR				\$0.00	0			\$0.00	0
Invoice Summary Line Total :					\$0.00	0			\$0.00	0

Summary Invoice Line: Usage - Intraswitch

Class of Service	USOC / Call Pack	Qty / Msgs	Current Charges	Usage Minutes	Recurring Charge	Recurring Qty	Fractional Charge	Fractional Qty	OC/C Charge	OC/C Qty
RES	919305				\$0.00	0	\$0.00	0	\$0.00	0
BUS	919305				\$0.00	0	\$0.00	0	\$0.00	0
Invoice Summary Line Total :					\$0.00	0	\$0.00	0	\$0.00	0

Summary Invoice Line: Non-Recurring Charges

Class of Service	USOC / Call Pack	Qty / Msgs	Current Charges	Usage Minutes	Recurring Charge	Recurring Qty	Fractional Charge	Fractional Qty	OC/C Charge	OC/C Qty
PU7	NR9UU				\$0.00	0	\$0.00	0		
Invoice Summary Line Total :					\$0.00	0	\$0.00	0		

Summary Invoice Line: Miscellaneous

Class of Service	USOC / Call Pack	Qty / Msgs	Current Charges	Usage Minutes	Recurring Charge	Recurring Qty	Fractional Charge	Fractional Qty	OC/C Charge	OC/C Qty
BUS	919205				\$0.00	0	\$0.00	0	\$0.00	0
RES	919205				\$0.00	0	\$0.00	0	\$0.00	0
BUS	919206				\$0.00	0	\$0.00	0	\$0.00	0
RES	919206				\$0.00	0	\$0.00	0	\$0.00	0
BUS	919211				\$0.00	0	\$0.00	0	\$0.00	0
RES	919211				\$0.00	0	\$0.00	0	\$0.00	0
RES	919233				\$0.00	0	\$0.00	0	\$0.00	0
RES	919305				\$0.00	0	\$0.00	0	\$0.00	0
RES	919365				\$0.00	0	\$0.00	0	\$0.00	0

RES	919377
RES	999380
RES	999381
RES	999383
RES	999384
RES	999385
RES	999388
PU7	ESX
PU7	N8D
PU7	NPU
PU7	NRSC
PU7	UXTBU

Invoice Summary Line Total :

Invoice Summary
Group Total :

\$0.00	0	\$0.00	0	\$0.00	0
\$0.00	0	\$0.00	0	\$0.00	0
\$0.00	0	\$0.00	0	\$0.00	0
\$0.00	0	\$0.00	0	\$0.00	0
\$0.00	0	\$0.00	0	\$0.00	0
\$0.00	0	\$0.00	0	\$0.00	0
\$0.00	0	\$0.00	0	\$0.00	0
\$0.00	0	\$0.00	2	\$0.00	0
\$0.00	0	\$0.00	2	\$0.00	0
\$0.00	0	\$0.00	1	\$0.00	0
\$0.00	0	\$0.00	0	\$0.00	1
\$0.00	0	\$0.00	4	\$0.00	0
\$0.00	0	\$0.00	9		
\$0.00	0		20		

Summary Invoice Group: Daily Usage Record Charges

Summary Invoice Line: Daily Usage Record Charges

Class of Service	USOC / Call Pack	Qty / Msgs	Current Charges	Usage Minutes	Recurring Charge	Recurring Qty	Fractional Charge	Fractional Qty	OC/C Charge	OC/C Qty
DURC	@DURC				\$0.00	0	\$0.00	0		
Invoice Summary Line Total :					\$0.00	0	\$0.00	0		
Invoice Summary Group Total :					\$0.00	0	\$0.00	0		

Invoice 109695 Total :

End of Invoice 109695

WorldCom Ex. 2.0
Hunter Direct
Investigation regarding Illinois Bell Section 271 compliance
Docket No. 01-0662
Schedule EH-1
PUBLIC VERSION

INVOICE ADJUSTMENTS
from
AMERITECH UNBUNDLED SERVICES



Invoice Number: 109695

Customer Code:

Customer #:

Invoice Date: 2/16/02

Credits

Date	Invoice	COS	USOC	Gross Amt.	Disc. %	Disc. Amt.	Adj. Amount	Qty	Description
------	---------	-----	------	------------	---------	------------	-------------	-----	-------------

Debits

Date	Invoice	COS	USOC	Gross Amt.	Disc. %	Disc. Amt.	Adj. Amount	Qty	Description
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Hurter Direct
Investigation regarding Illinois Bell Section 271 compliance
Docket No. 01-0662
Schedule EH-1
PUBLIC VERSION

8

WorldCom Ex 2.0
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Investigation Regarding Illinois Bell Section 271 Compliance
Docket No. 01-0662
Schedule EH-2
Public Version

This schedule contains the following:

Ameritech UNE-P Process Overview.

This schedule contains a total of five (5) pages.

Date: **August 14, 2001**

Number: **CLECAM01-236**

Effective Date: **August 18, 2001**

Category: **UNE-P**

Subject: **(BILLING) UNE-P RBS to CABS Migration**

Related Letters: **NA**

States Impacted: **Ameritech**

Response Deadline: **NA**

Contact: **Account Manager**

Conference Call/Meeting: **NA**

UNE-P Existing Process Overview

Today UNE-P billing is accomplished across two of Ameritech's billing systems, RBS and CABS. The RBS system generates a bill to the Customer for all non-recurring, recurring and usage charges associated with the UNE-P Port. The CABS system generates a bill to the Customer for all non-recurring and recurring charges associated with the UNE-P Loop. This is inconsistent with the other SBC companies where CABS bills both the UNE-P Port and Loop charges.

UNE-P Conversion Overview

Ameritech will convert the billing of the UNE-P Port charges to CABS and consolidate the UNE-P and UNE-Loop charges on the same bill record. The conversion will provide CABS billing information according to OBF Guidelines as a Type J account. Consistent with SBC implementation, the CABS Type J account will combine the UNE-P Port and Loop billing. The CABS accounts will be established at a LATA level. Usage associated with the UNE-P Port will be billed in CABS at the end office level. Usage associated with Operator Services and Directory Assistance will continue to bill in RBS.

RBS and CABS may not share like billing periods, and this may require the new CABS UNE-P account to carry a new billing period. The new CABS UNE-P billing period will be as close to the existing RBS billing period as possible. These new billing periods also may be different from the current CABS UNE-P Loop billing period.

The new CABS UNE-P accounts will be established in July 2001. These accounts will establish the new Billing Account Number (BAN)-and billing period. These accounts will initially contain no billing elements. This will result in July 2001 bills being rendered with a zero balance.

Starting August 18, 2001, a conversion process will begin to merge the RBS UNE-P Port account and CABS UNE-P Loop account into a single CABS UNE-P account. This account merger will result in a single CABS bill. The migration will be accomplished by generating individual CABS service orders that will migrate individual RBS

accounts to the proper UNE-P CABS account. The individual service orders will generate fractional charges (OC&Cs) for continuous billing. As the combined billing is implemented, credit OC&Cs will be generated on the CABS Loop account.

RBS will continue to bill Operator Service and Directory Assistance charges. In addition, RBS will bill any unbilled non-recurring charges and fractional OC&Cs from service order activity up to the time of conversion. Any unbilled Shared Transport usage charges that were received by RBS prior to conversion will be billed on the RBS account.

The ordering and provisioning of UNE-P circuits will not be impacted by the conversion. In order to minimize billing errors, CABS billing processing of UNE-P order activity will be held until the conversion is completed. The resultant delay in processing UNE-P service order activity may impact Billing Measurement #17.

We expect the conversion activities to complete by mid-October. All held UNE-P service order activity not already processed will be released at this time. Final bills for the CABS Loop accounts will be issued by end of year 2001.

UNE-P Conversion Timeline

July 1 - 31

- New BAN and bill period information available through the Ameritech Account Management Team.
- New CABS accounts will be established, one per Customer/State/LATA.
- New CABS accounts, once established, will generate zero balance bills.
- New CABS accounts may be established in a different billing period from existing accounts.

August 1 - 17

- RBS generates UNE-P bills to the Customer for bill periods August 1st through August 13th.
- RBS continues to process service order activity and generate recurring, non-recurring and fractional charges (OC&Cs).
- RBS continues to receive Shared Transport usage charges.

August 18th

- Conversion migration begins.
- Shared Transport usage charges are sent to CABS rather than RBS.
- UNE-P service order billing activity is held until conversion is complete. (No impact on UNE-P ordering or provisioning).

August 19 - 31

- Conversion migration continues.
- RBS UNE-P bills will contain any unbilled non-recurring charges and fractional charges (OC&Cs) generated by UNE-P service order activity and Shared Transport usage charges sent to RBS (last RBS billed period to conversion date).
- All Operator Service and Directory Assistance charges will continue to be billed in RBS.
- CABS UNE-P Loop accounts will continue to bill the UNE-P Loop charges. (If the migration has occurred, only factional charges will continue to be billed).

- The new CABS UNE-P account will begin billing UNE-P Port charges, UNE-P Loop charges and Shared Transport usage charges. (UNE-P Port and Loop charges will start appearing as account information is migrated and combined on a single account).

September 1 - 30

- Conversion migration continues.
- RBS UNE-P bills will contain any unbilled non-recurring charges and fractional charges (OC&Cs) generated by UNE-P service order activity and Shared Transport usage charges sent to RBS (last RBS billed period to conversion date).
- All Operator Service and Directory Assistance charges will continue to be billed in RBS.
- CABS UNE-P Loop accounts will continue to bill the UNE-P Loop charges. (If the migration has occurred, only fractional charges will continue to be billed).
- The new CABS UNE-P account will begin billing UNE-P Port charges, UNE-P Loop charges and Shared Transport usage charges. (UNE-P Port and Loop charges will start appearing as account information is migrated and combined on a single account).

October 1 - 31

- Conversion migration expected to end.
- All held UNE-P service order activity not already processed will be released
- All Operator Service and Directory Assistance charges will continue to be billed in RBS.
- CABS UNE-P Loop accounts will continue to bill the UNE-P Loop charges. (If the migration has occurred, only fractional charges will continue to be billed).
- The new CABS UNE-P account will begin billing UNE-P Port charges, UNE-P Loop charges and Shared Transport usage charges. (UNE-P Port and Loop on a single account).
- Normal UNE-P billing Service Order flow begins after held Service Order backlog processes.

November 1 - 30

- All Operator Service and Directory Assistance charges will continue to be billed in RBS.
- CABS UNE-P Loop accounts may continue to bill the UNE-P Loop charges. (If no clean up required, the accounts will be disconnected and final bills rendered).
- The new CABS UNE-P account will bill UNE-P Port charges, UNE-P Loop charges and Shared Transport usage charges.

December 1 - 31

- All Operator Service and Directory Assistance charges will continue to be billed in RBS.
- All remaining CABS Loop accounts will be disconnected and final bills rendered.
- The new CABS UNE-P account will bill UNE-P Port charges, UNE-P Loop charges and Shared Transport usage charges.

The UNE-P Conversion Billing Impact examples illustrate the relationship between the existing CABS UNE-P Loop Accounts, the existing RBS UNE-P Switched Port Accounts,

and the 'new' combined CABS UNE-P Loop and Switched Port Accounts. The examples are provided for each state for each month of the conversion timeline.

The examples contain columns for each type of Account. A sampling of LATAs for each state has been provided to illustrate the relationship between all 3 Accounts. The first page of each example provides the existing RBS Bill Date and the 'new' combined CABS UNE-P Bill Date, along with significant conversion milestones. Prior to the start of each month the example will contain a notation of any milestone and how this particular milestones will impact each of the 3 types of accounts. These examples show where billing for monthly recurring charges, non-recurring charges, and usage charges for the Port and Loop will appear on a month to month basis during the conversion.

The Local Service Center will continue to serve as the single point of contact for all UNE-P ordering and billing issues.

Ameritech reserves the right to make any modifications to or cancel the above information prior to the effective date. Should any modifications be made to the information, those modifications will be reflected in a subsequent letter. Should the information be canceled, Ameritech will provide additional notification at the time of cancellation. In no event shall Ameritech incur any liability whatsoever to any carrier or other person or party if the information mentioned above is modified or canceled by Ameritech.

Attachment



"CABS Migration Bill
Mapping IN-IL-MI.do



"CABS Migration Bill
Mapping.doc"

WorldCom Ex 2.0
Hurter Direct
Investigation Regarding Illinois Bell Section 271 Compliance
Docket No. 01-0662
Schedule EH-3
Public Version

This schedule contains the following:

Ameritech Tariff:

Part 19 - Unbundled Network Elements and Number Portability;
Section 7 - Unbundled Directory Assistance Service.

This schedule contains a total of two (2) pages.

PART 19 - Unbundled Network Elements and Number
Portability

SECTION 7 - Unbundled Directory Assistance
Service

1st Revised Sheet No. 9

1. UNBUNDLED DIRECTORY ASSISTANCE (cont'd)

(N)

E. PRICES (cont'd)

1. Service Elements (cont'd)

Description	Monthly Payment			
	Term Payment Plans			
	1 Month	12 Months	24 Months	36 Months
Directory Assistance, Term Payment Plan, rate per call	\$.258	.255	.250	.245

2. Payment Plans

• Month to Month

The minimum period for the Term Payment Plan is one month, unless otherwise specified. The month-to-month price is subject to Company initiated changes.

(N)

Pursuant to Second Interim Order in Ill. C.C. Docket Nos. 96-0486/0569
Consolidated, dated February 17, 1998.

Issued: April 3, 1998

Effective: April 18, 1998

By D. H. Gebhardt, Vice President - Regulatory Affairs
225 West Randolph Street
Chicago, Illinois 60606

WorldCom Ex. 2.0
Hurter Direct
Investigation regarding Illinois Bell Section 271 compliance
Docket No. 01-0662
Schedule EH-3

WorldCom Ex 2.0
Hurter Direct
Investigation Regarding Illinois Bell Section 271 Compliance
Docket No. 01-0662
Schedule EH-4
Public Version

This schedule contains the following:

Ameritech Tariff:

Part 19 - Unbundled Network Elements and Number Portability;

Section 8 - Unbundled Operator Services.

This schedule contains a total of two (2) pages.

PART 19 - Unbundled Network Elements and Number
Portability
SECTION 8 - Unbundled Operator Services

2nd Revised Sheet No. 10
Cancels
1st Revised Sheet No. 10

1. UNBUNDLED OPERATOR SERVICES (cont'd)

E. PRICES (cont'd)

1. Service Elements

Description	Nonrecurring Charge	Monthly Price	
Manual Call Assistance, per occurrence	-	.364	(T)
Automated Call Assistance, per occurrence	-	.018	(T)
Busy Line Verification per occurrence	-	.936	(T)
Busy Line Verification Interrupt, per occurrence	-	1.094	(T)
Branding, per trunk group ^{/1/}	299.73	-	(T)

/1/ When branding service is provided on a combined toll and assist Operator Service and Directory Assistance trunk group basis, as technically feasible, a single branding charge will apply. The telecommunications carrier is also responsible for the rates applicable to custom routing, transport and any other services or network elements it orders to deliver its traffic to the Company's switch on separate direct trunks.

Pursuant to Second Interim Order in Ill. C.C. Docket Nos. 96-0486/0569 Consolidated, dated February 17, 1998.

Issued: September 8, 1998

Effective: September 9, 1998

By D. H. Gebhardt, Vice President - Regulatory Affairs
225 West Randolph Street
Chicago, Illinois 60606

WorldCom Ex. 2.0

Hurter Direct

Investigation regarding Illinois Bell Section 271 compliance

Docket No. 01-0662

Schedule EH-4